

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Brittany Haas, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

Aldi, Inc.,

Defendant.

Civil Action No. 1:22-cv-00375

**DEFENDANT ALDI INC.’S UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO FILE ITS RESPONSIVE PLEADING**

Defendant ALDI INC. (“Aldi”) moves this Court pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure for an extension of time to file its responsive pleading. In further support of its motion, Aldi states as follows:

1. Aldi’s responsive pleading is currently due on June 6, 2022.
2. The Court has set an initial status conference for June 9, 2022.
3. The parties have settled in principle and anticipate entering a stipulation to dismiss this action by agreement within the next 28 days.
4. For purposes of judicial efficiency and economy, the parties wish to focus their efforts on finalizing their anticipated agreement and request that this Court extend Aldi’s time to file its responsive pleading from June 6, 2022 to July 5, 2022 and reset the initial status conference to a date following July 5, 2022 to the extent that this case is still pending.
5. The undersigned counsel has shared this motion with plaintiffs’ counsel, Spencer Sheehan, and he has stated that he has no objection to this motion.

6. Aldi brings this motion prior to the expiration of the current deadline to file its responsive pleading in compliance with Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and does not bring this motion for any improper purpose such as delay or harassment.

WHEREFORE defendant Aldi respectfully requests that this Court enter an order: (1) granting its motion for an extension of time; (2) extending its time to file its responsive pleading from June 6, 2022 to July 5, 2022; and (3) resetting the initial status conference to a date after July 5, 2022.

Dated: June 2, 2022

Respectfully submitted,

/s/ Patrick P. Clyder

Patrick P. Clyder (ARDC # 6292573)
McGuireWoods LLP
77 West Wacker Drive
Suite 4100
Chicago, IL 60601-1818
(312) 750-8668
pclyder@mcguirewoods.com
Counsel for Defendant Aldi Inc.

CERTIFICATE OF SERVICE

I, Patrick P. Clyder, an attorney, hereby certify that on June 2, 2022, I caused a true and correct copy of the foregoing Unopposed Motion for Extension of Time to File its Responsive Pleading to be served via the Court's CM/ECF Filing System and via electronic mail upon the following:

Spencer Sheehan
Sheehan & Associates, P.C.
60 Cuttermill Road, Suite 409
Great Neck, NY 11021
(516) 268-7080
spencer@spencersheehan.com
Attorneys for Plaintiff

/s/ Patrick P. Clyder

Patrick P. Clyder